



**ICC Docket No. 01-0662**

**Service Order Completion Timeliness Plan**

**May 1, 2003**

## **SOC Timeliness Plan**

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## **1. Purpose**

The purpose of this plan is to describe the actions that Illinois Bell Telephone Company (“SBC” or “SBC Illinois”) commits to take to address the tested results for Service Order Completion (“SOC”) timeliness from the BearingPoint OSS test. SBC Illinois has engaged BearingPoint to provide, no later than November 2003, verification that this issue has been addressed. The actual third party verification plan will be proposed by BearingPoint and approved by Staff before it is commenced.

This plan was developed consistent with the January 6, 2003 recommendation from the Illinois Commerce Commission (“ICC”) Staff regarding continuation of the BearingPoint review of SBC Illinois’ OSS, which was approved by the ICC on January 14, 2003. Specifically, with regard to Timely Completion Notices, the Staff recommended that SBC Illinois should “make the necessary fixes and direct BearingPoint to either re-test the item until SBC Illinois has satisfied the evaluation criteria or provide verification that the issue has been addressed.” SBC Illinois has, as appropriate, taken steps to address SOC timeliness, will take additional steps to confirm the effectiveness of those steps, and has retained BearingPoint to evaluate SBC’s implementation of this plan.

## **2. Background**

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Exception 18 as part of the Third Party Operations Support Systems (“OSS”) testing on November 29, 2001 stating that they have observed instances where SBC has failed to meet the timeliness benchmark for the return of Service Order Completion (“SOC”) notification transactions. In this test, the timing of the SOC transaction, which is a notification that the provisioning associated with a CLEC order is completed, is compared to the work completion date for the associated order. In the course of evaluating this issue, BearingPoint performed three tests of SOC timeliness for Illinois. On November 8, 2002, SBC requested that no further retesting be performed. BearingPoint’s December 20, 2002 Illinois OSS Evaluation Project Report at pp. 574-575 found that test criteria for TVV1-28 was “not satisfied.”

Subsequent to its Report, as of April 25, 2003, BearingPoint reported as additional information to Exception 18 that SBC had returned 85% of SOC’s within one day of work completion (965 out of 1137 Mechanized SOC’s were received by the Test CLEC from SBC Illinois systems within the 1-day, 99 percent benchmark). BearingPoint also reported that, taking into consideration that Sundays and holidays are non-processing days at SBC, 92.6% of SOC’s were received by the Test CLEC within the one-day timeliness benchmark. 1053 out of 1137 (92.6 percent) Mechanized SOC’s were received by the Test CLEC in Illinois from SBC Illinois systems within the 1-day, 99 percent benchmark.

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During the course of its test, BearingPoint used a benchmark of 99 percent of Completion Notices received within one day of the completion date for this test which BearingPoint considered analogous to the standard defined for PM 7.1 (Percent Mechanized Completions Returned Within One Day of Work Completion). Following the collaborative six-month review of performance metrics, SBC submitted the resulting modifications to the SBC Illinois performance metrics business rules to the Illinois Commerce Commission (“ICC”) in February 2003. These modifications became effective on March 24, 2003. As part of these approved business rule changes, the business rule for PM 7.1 was clarified to be based on system processing days and to have a benchmark of 97% for Illinois. These changes were implemented effective with February results reported in March 2003.

SBC implemented system modifications and process improvements to address any systemic issue identified when investigating the results reported by BearingPoint during the course of its evaluation. This process complemented SBC’s internal practice of monitoring its reported PM 7.1 results and initiating corrective action where appropriate. Some corrective actions, due to the timing of the correction relative to BearingPoint’s testing, were not reflected in BearingPoint’s test results. The reported PM 7.1 results based on Illinois CLEC commercial activity for the past five months (November 2002 through March 2003) reflect the resultant improvement:

	Resale	UNE	UNE-P	LNP Only	Aggregate
<b>November 2002</b>	98.83%	99.08%	97.04%	69.84%	<b>96.37%</b>
<b>December 2002</b>	95.27%	97.42%	99.59%	72.46%	<b>98.38%</b>
<b>January 2003</b>	97.28%	98.17%	98.83%	92.01%	<b>98.65%</b>
<b>February 2003</b>	98.56%	99.37%	99.42%	96.01%	<b>99.35%</b>
<b>March 2003</b>	98.71%	99.52%	99.56%	97.49%	<b>99.49%</b>
<b>Average</b>	97.46%	98.48%	98.77%	73.45%	

### 3. Root Cause Analysis and Corrective Actions

A SOC notification advises the CLEC that the work necessary to provision an order has been completed. When a local service request (“LSR”) submitted by a CLEC through the EDI or GUI interfaces is received by SBC, it is converted into the internal service order format used by SBC Midwest’s systems. If the LSR is “flow-through eligible,” that conversion occurs electronically. If the LSR is not flow-through eligible, SBC’s Local Service Center (“LSC”) representatives manually create the necessary service orders. Once created, these service orders are distributed to SBC Midwest’s downstream systems involved in the fulfillment of the order.

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When the provisioning work is completed, the service order is placed into “completion” status in SBC’s backend systems. Depending on the type of order, this status change may occur automatically or may require a manual input. A SOC notification is returned to the CLEC via the same interface used to submit the original LSR.

The SOC timeliness failures identified by SBC as part of its regular management of this process and those identified by BearingPoint during the course of its testing have generally fallen into one of two categories. In the first category, the work completion notification is generated in a timely manner but, due to a system error or manual data entry error, the notification cannot be properly associated with the CLEC’s original CLEC LSR. This prevents the SOC from being provided to the CLEC on a timely basis.

During the course of the last iteration of SOC testing in Illinois, which began on August 27, 2002, certain system changes were made by SBC as a result of identified failures in this first category. These changes addressed 17 of the 84 failures identified during the latest BearingPoint retest. Primary among these changes was a system change implemented on November 20, 2002 to correct the tracking of relationship between CLEC LSR number and internal SBC order number for certain UNE-P orders.

An additional 37 identified failures were due to manual errors in the creation of the service orders. As these test failures were identified (August through November 2002), Local Service Center management identified the manual errors, and provided additional training and coaching to the involved service representatives.

In other cases, SOC transmission is delayed when manual intervention is required to put the service order into “completed” status. If the work completion notification is entered into the backend provisioning system late, the processing that would cause that completion notification to be delivered is not triggered in a timely manner. Such was the case for a number of the failures identified by BearingPoint. SBC has addressed this issue through reinforcement of its procedures for the manual input of work completion information with the appropriate operations work center staff.

In addition to the foregoing, during May 2003, SBC will conduct a two-week review of all SOC timeliness failures. Any corrective actions determined to be necessary based on that review will be taken by June 30, 2003.

## **4. Third Party Examination Approach**

The effectiveness of the efforts undertaken by SBC to address the SOC timeliness issues identified during the course of the OSS test, as outlined above, will be determined by a third-party evaluation of SBC’s performance in returning SOC notifications in the production environment. While the third party selected, BearingPoint, will design its own work program and parameters, which will then be subject to Staff approval, SBC anticipates that the third party evaluation will address and include a review of actual commercial transactions as follows:

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- The third party should report the timeliness of service order completion notifications by comparing the outbound transmission date of such notifications to the work completion date using a nonbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and with the Illinois Commerce Commission (“ICC”) staff prior to its implementation. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint’s project plan. The timeliness of service order completion notifications is expected to improve when compared to BearingPoint’s test results of 92.6%<sup>1</sup>. SBC’s internal target is 97% of mechanized completions sent/made available to the CLEC within 1 day of work completion, consistent with version 1.9 of the Performance Measurement business rules and benchmarks. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the ICC.

SBC will file bimonthly third party reports beginning with May-June 2003 period, to be filed by July 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the ICC by the 15<sup>th</sup> of the following month.

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<sup>1</sup> BearingPoint additional information for Exception 18, dated April 25, 2003. See footnote 1.